

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
PECOS DIVISION**

**MARY CATHERINE “KATIE”  
SANCHEZ,  
Plaintiff,**

**v.**

**PRESIDIO COUNTY, TEXAS and  
FRANCES GARCIA in her individual  
capacity,  
Defendants**

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**NO. 4:19-CV-00037**

**JOINT STIPULATION OF FACTS**

TO THE HONORABLE JUDGE DAVID COUNTS:

Plaintiff, MARY CATHERINE “KATIE” SANCHEZ and Defendants PRESIDIO COUNTY, TEXAS and FRANCES GARCIA (collectively the “Parties”) hereby stipulate to the following facts as true and correct and it is anticipated that these Joint Stipulated Facts will be presented to the Court in this case:

- a. The Office of Management and Budget (OMB) was created in 2013.
- b. Plaintiff Ms. Sanchez and Defendant Garcia each ran for County Treasurer in the Democratic Primary in 2014.
- c. Defendant Garcia has been the duly elected Presidio County Treasurer since January 1, 2015.
- d. The Plaintiff Ms. Sanchez moved to a new position as Assistant Director of OMB in 2014 and became the OMB Director in 2015.
- e. Plaintiff Ms. Sanchez ran against Defendant Garcia for County Treasurer again in the Democratic primary election in 2018.
- f. Defendant Garcia defeated Plaintiff Sanchez in the March 2018 primary.
- g. In April 2018 Defendant Garcia requested an item to be placed on the Agenda of the Commissioners Court to discuss Plaintiff Sanchez.

- h. On August 16, 2018 Commissioner Loretto Vasquez placed an item on the Commissioners Court agenda for the August 22, 2018 meeting to eliminate the OMB Department.
- i. The Presidio County Commissioners Court voted to eliminate the OMB Department at a meeting of the Commissioners Court on August 22, 2018.
- j. The elimination of the OMB Department became effective October 1, 2018.

Dated: May 19, 2021.

Respectfully submitted,

/s/ John A. Wenke

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

This is to certify that on the 19<sup>th</sup> day of May, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notice of such filing to all attorneys of record on file.

/s/ Jon Mark Hogg

Jon Mark Hogg